

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA)	
Plaintiff,)	
)	
vs.)	No. 3:16-CR-20
)	(Collier/Guyton)
MARK HAZELWOOD, et al.)	
Defendant.)	

MOTION REQUESTING MODIFICATION OF TERMS OF RELEASE

Mark Hazelwood, through counsel, files this motion requesting the Court to modify the terms of his release to substitute his third-party custodian to permit Mrs. Hazelwood to travel on June 19-26, 2020.

I. FACTUAL BACKGROUND

This Court has granted Mr. Hazelwood's prior requests to have substitute third-party custodians step in during his wife's travel.

During each previous modification to Mr. Hazelwood's conditions, he has scrupulously abided each and every instruction from the Probation Office. We again ask the Court to modify Mr. Hazelwood's bail to permit a substitute third-party custodian to allow Mrs. Hazelwood to travel.

II. MODIFICATION REQUEST

A. June 19-26, 2020

Mrs. Hazelwood is scheduled to travel from June 19-26, 2020. To facilitate her travel Mr. Hazelwood's son, Asa Hazelwood, and a close family friend, Rick Giecek, have agreed to step in as third-party custodians. They will be informed of their duties and will sign the bond conditions.

I have spoken to AUSA Trey Hamilton and he defers to the Court and the United States Probation Office. I have also spoken to Pretrial Services who defers to the Court.

WHEREFORE, Mr. Hazelwood requests that this Honorable Court enter an Order modifying the conditions of his release allowing Mr. Asa Hazelwood and Mr. Giecek to step in as third-party custodians from June 19-26, 2020.

DATED: Knoxville, Tennessee
 June 12, 2020

Respectfully submitted,

s/ Bradley L. Henry
Bradley L. Henry (TN Bar No. 025447)
Breeding Henry Baysan PC
900 S. Gay St.
Suite 1950
Knoxville, TN 37902
(865) 670-8535
bhenry@bhblegal.com

s/ Jim Walden
Walden Macht & Haran
One Battery Park Plaza
New York, New York 10004
(212) 335-2031
jwalden@wmhlaw.com

CERTIFICATE OF SERVICE

I hereby certify that, on June 12, 2020, a true and correct copy of the foregoing document was filed on CM/ECF with the U.S. District Court for the Eastern District of Tennessee. Notice of this filing was served on all CM/ECF parties.

/s/ Bradley L. Henry